

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: JOHN SCOTT EDMONDSON**

**CASE NO. 10-12405-DWH**

**AGRO DISTRIBUTION, LLC'S MOTION TO EXTEND DEADLINE  
TO OBJECT TO DISCHARGEABILITY OF PARTICULAR INDEBTEDNESS**

Agro Distribution, LLC ("Agro") files this motion for additional time to object, if necessary, to the dischargeability of a particular indebtedness due Agro and correspondingly file a complaint seeking same against the Debtor John Scott Edmondson ("Debtor"), and in support thereof would show as follows, to-wit:

1. This court has jurisdiction over the subject matter herein and the parties hereto pursuant to 28 U.S.C. § 1334, 11 U.S.C. § 523, along with other statutes and rules. This is a core proceeding as defined by 28 U.S.C. § 157(b)(2)(A).

2. On or about May 14, 2010 ("Petition Date"), the Debtor filed a Chapter 7 Petition for relief pursuant to Title 11 of the United States Bankruptcy Code.

3. The law firm of Mitchell, McNutt & Sams, P.A. has been retained as counsel by Agro in the present matter to, inter alia, explore potential §523 and/or §727 actions against the Debtor. Agro is still reviewing those grounds, if any, to deny the dischargeability of a particular debt due Agro. As such, Agro files the present motion seeking an additional sixty (60) days to object, if necessary, to the dischargeability of particular indebtedness due Agro as described herein, to pursue further investigation as to whether a complaint should be filed objecting to the dischargeability of a particular indebtedness due Agro.

WHEREFORE, Agro respectfully requests the entry of an order granting it an additional sixty (60) days from August 9, 2010, up to and including October 8, 2010, to object, if necessary,

to the dischargeability of a particular indebtedness due Agro by Complaint or otherwise. Agro prays for such other general and specific relief as this court may deem just.

RESPECTFULLY SUBMITTED, this the 9th day of August, 2010.

Respectfully submitted,

AGRO DISTRIBUTION, LLC

/s/ Rosamond H. Posey

D. ANDREW PHILLIPS (MSB #8509)

ROSAMOND HAWKINS POSEY (MSB #101247)

MITCHELL, McNUTT & SAMS, P.A.

P.O. Box 947

Oxford, MS 38655-0947

(662) 234-4845

**CERTIFICATE OF SERVICE**

I hereby certify that on the 9<sup>th</sup> day of August, 2010, a copy of the foregoing **Agro Distribution, LLC's Motion to Extend Deadline to Object to Dischargeability of Particular Indebtedness** was served on the parties listed below by first-class mail, postage prepaid, unless said party is a registered CM/ECF participant who has consented to electronic notice, and the Notice of Electronic Filing indicates that Notice was electronically mailed to said party:

Matthew Y. Harris, Esq.  
P.O. Box 29  
New Albany, MS 38652

Stephen P. Livingston, Sr., Esq.  
Chapter 7 Trustee  
P.O. Box 729  
New Albany, MS 38652

U.S. Trustee  
Office of the U.S. Trustee  
100 West Capitol Street, Suite 706  
Jackson, MS 39269

DATED, this the 9<sup>th</sup> day of August, 2010.

/s/ Rosamond H. Posey